

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CAITLIN O'CONNOR,)
Plaintiff,) Case No. 3:20-cv-00628
v.) District Judge Richardson
THE LAMPO GROUP, LLC,) Magistrate Judge Frensley
Defendant.) Jury Demand)

DEFENDANT'S MOTION FOR EXTENSION OF TIME

Defendant, The Lampo Group, LLC, by and through the undersigned counsel and pursuant to Rule 16 of the Federal Rules of Civil Procedure, moves the Court to extend its deadline to comply with the Court's Sealed Order dated August 18, 2022 (Doc. #90). In support of this motion, Defendant states the following:

1. The Court's Sealed Order directs Defendant to file redacted copies of certain documents that the parties filed in connection with summary judgment briefing.
2. Defendant's deadline to comply with the Court's Sealed Order is today, August 31, 2022.
3. Defendant will timely file redacted copies of all documents addressed in the Court's Sealed Order, except Docs. #76-20, 76-29, and 76-30.
4. With respect to Docs. #76-29 and 76-30, Defendant does not have copies of those documents with Plaintiff's proposed redactions.¹ Defendant has requested those documents from Plaintiff and will file redacted copies promptly upon receipt.

¹ Defendant's counsel moved to a new law firm during this case and are still transitioning files from the old firm to the new firm. Upon information and belief, Docs. #76-29 and 76-30 with Plaintiff's proposed redactions have still not been transitioned.

5. With respect to Doc. #76-20, Defendant has questions about how to comply with the Court's Sealed Order. Defendant has contemporaneously filed a Motion for Instructions from the Court (Doc. #91). Upon receipt of instructions from the Court, Defendant will promptly file a redacted copy of Doc. #76-20.

Therefore, Defendant asks the Court to extend its deadline to comply with its Sealed Order (Doc. #90) to seven (7) days after the Court resolves Defendant's Motion for Instructions (Doc. #91).

Respectfully submitted,

/s/Daniel Crowell
Leslie Sanders (TN #18973)
Daniel Crowell (TN #31485)
JACKSON LEWIS P.C.
611 Commerce Street
Suite 3102
Nashville, TN 37203
Telephone: (615) 565-1661
Fax: (615) 206-2244
leslie.sanders@jacksonlewis.com
daniel.crowell@jacksonlewis.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that, on August 31, 2022, I filed *Defendant's Motion for Extension of Time* via the Court's electronic filing system, which will automatically notify and send a copy of that filing to:

Heather Moore Collins
Ashley Shoemaker Walter
HMC Civil Rights Law, PLLC

Attorneys for Plaintiff

/s/Daniel Crowell
Daniel Crowell (TN #31485)
Attorney for Defendant